

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

AUGUST WILDMAN, *et al.*,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,
DEUTSCHE BANK TRUST COMPANY
AMERICAS, STANDARD CHARTERED BANK,
STANDARD CHARTERED PLC, STANDARD
CHARTERED BANK (PAKISTAN) LIMITED,
DANSKE BANK A/S, DANSKE MARKETS INC.,
PLACID NK CORPORATION d/b/a PLACID
EXPRESS, and WALL STREET EXCHANGE LLC,

Defendants.

21 Civ. 4400 (KAM) (RML)

**ORAL ARGUMENT
REQUESTED**

**NOTICE OF THE DANSKE DEFENDANTS’
MOTION TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE that Defendants Danske Bank A/S and Danske Markets Inc. (together, the “Danske Defendants”) will respectfully move this Court, before the Honorable Kiyo A. Matsumoto, at the U.S. District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, on a date and time designated by the Court, for an order dismissing the Amended Complaint (the “Complaint”) in its entirety, with prejudice, (i) pursuant to Federal Rule of Civil Procedure 8(a), because plaintiffs fail to set forth a short and plain statement of their claim; (ii) pursuant to Federal Rule of Civil Procedure 12(b)(6), because the Complaint fails to state a claim upon which relief can be granted; and (iii) pursuant to Federal Rule of Civil Procedure 12(b)(2), because the Complaint fails to sufficiently allege personal jurisdiction over Danske Bank.

The motion is supported by the accompanying Memorandum of Law, dated March 18, 2022, filed by the Danske Defendants; the Declaration of Brian T. Frawley, dated March 18, 2022, and the accompanying exhibits; and the proceedings to date in this action.

Dated: March 18, 2022
New York, New York

Respectfully submitted,

/s/ Brian T. Frawley

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